

**REMARKS**

Claims 1, 6-10, 12-13, 25, 44 and 47-56 were previously pending in this application. Claims 19-24 and 35-40 have been previously withdrawn. Claims 2-5, 11, 14-18, 26-34, 42-43 and 45-46 have been canceled without prejudice or disclaimer. Claim 41 remains allowed. Applicants submit that no new matter has been added. Applicants respectfully request reconsideration of the Application in view of the following remarks.

**Claim Rejections – 35 U.S.C. § 102**

Claims 1, 6, 8-9, 12, 25, 44, 47-50, 52-53 and 55 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Krueger et al., U.S. Patent No. 6,649,220 B1 or under 35 U.S.C. § 102(b) as being anticipated by Krueger et al., WO 00/21684. Applicants respectfully submit that the pending claims are patentably distinct from the cited references.

Independent claim 1 recites, inter alia:

An apparatus for processing a portion of an automobile body, the portion including a concave portion which extends along a curved line in a substantially longitudinal direction of the automobile body and has opposing side walls and a bottom, comprising:

a processing device;

a supporting device movably supporting the processing device, wherein the supporting device includes a slidably supported structure, wherein the slidably supported structure is in exclusively slidable engagement with the supporting device and is free to move in a widthwise direction of the automobile body relative to the automobile body, wherein such movement of the slidably supported structure is solely and directly in response to movement of the processing device along the concave portion . . .

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wherein the processing device is mounted to the slidably supported structure and includes a processing head having a tip for engaging either of the side walls and the bottom of the concave portion of the automobile,

wherein the processing head moves in the substantially longitudinal direction relative to and along the concave portion, while the processing head moves in the widthwise direction in response to the tip contacting either of the side walls of the concave portion when the slidably supported structure is moved relative to the automobile body by the longitudinal drive device.

Applicants submit that Krueger et al. cannot anticipate independent claim 1 because it does not teach every element of this claim. See MPEP § 2131. Krueger et al. do not disclose, teach or suggest a supporting device having “a slidably supported structure, wherein the slidably supported structure is in exclusively slidable engagement with the supporting device . . . .” The January 20, 2006 Office Action states that mounting bracket 181 in Krueger et al. exemplifies both support device (10) and slidably supported structure (23) as disclosed by Applicants in claim 1. See Office Action, p. 2. The Examiner also states that the processing head is connected to mounting bracket 181. See Office Action, p. 2. However, mounting bracket 181 of Krueger et al. cannot be in exclusively slidable engagement with itself nor can the processing head be connected to both the support device and the slidably supported structure and disclose Applicants’ invention. While Applicants’ invention discloses the processing head being connected to the slidably supported structure (23), which is in exclusively slidable engagement with the support device (10), Krueger et al. disclose a single structure (181) rigidly connected to compliance mechanism (10). Furthermore, analogizing the single structure (181) disclosed in Krueger et al. to two separately-functioning elements in Applicants’ invention – support device

(10) and slidably supported structure (23) -- contradicts the fact that the slidably supported structure (23) of Applicants' invention moves independent of the support device (10).

Moreover, Krueger et al. are also silent as to the slidably supported structure being free to move solely in response to movement of a processing device along a concave portion of a workpiece. Although the January 20, 2006 Office Action also contends that the processing head in Krueger et al. is forced to move in the widthwise direction through contact of the tip with either of the side walls of a concave portion, Krueger et al. do not teach or suggest a workpiece having a concave portion with opposing side walls and a bottom. See Office Action, p. 2. Nowhere do Krueger et al. teach or suggest a workpiece having a concave portion. The Krueger et al. specification, in fact, does not disclose the term "concave". Rather, the Krueger et al. invention is specifically engineered to be used in the automotive glass industry for the application of primers, adhesives and promoters to the perimeter of automotive glass products, such as windshields and windows.

Moreover, the cylinder/piston rod mechanism of Krueger et al. expressly teaches away from an application tip that maintains a particular course along an automobile body or workpiece by contacting either of two side walls. In particular, the application tip in Krueger et al. maintains its course along the workpiece by employing fluid-operated cylinders to provide constant regulated pressure contact with the workpiece in the direction of the biasing force of the cylinders. See Krueger et al., col. 3, line 37 – col. 4, line 5. It is clear that Krueger et al. do not provide a mechanism that is freely slidable in two different, parallel directions in response to contact with the surface of the automobile body or workpiece.

For at least the above reasons, Applicants respectfully submit that Krueger et al. do not teach or suggest every element recited in independent claim 1 and that independent claim 1 is patentably distinct from Krueger et al. Further, Applicants submit that independent claim 25 is patentably distinct from Krueger et al. for at least similar reasons. Also, Applicants submit that claims 6, 8-9, 12, 44, 47-50, 52-53 and 55, which directly or indirectly depend from independent claims 1 or 25, are patentably distinct from Krueger et al. for at least similar reasons. Applicants respectfully request withdrawal of this ground of rejection.

#### **Claim Rejections – 35 U.S.C. § 103**

Claims 7, 10, 13, 51, 54 and 56 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Krueger et al., U.S. Patent No. 6,649,220 B1 or Krueger et al., WO 00/21684 in view of Clitheros et al., U.S. Patent No. 4,564,410. Claims 1, 6-10, 12-13, 25, 44 and 47-56 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Clitheros et al. in view of Krueger et al. Applicants respectfully submit that the pending claims are patentably distinct from the cited references, taken either alone or in combination.

Krueger et al. disclose a compliance mechanism for applying fluid to an application surface, whereby an applicator tip maintains contact with the application surface via the exertion of a constant regulated pressure force to the applicator tip by fluid-operated cylinders. See Krueger et al., col. 1, 8-14. The pressure-regulated cylinders of the compliance mechanism allow the applicator tip to accommodate changes in the shape of the application surface without losing contact during application of the fluid. See Krueger et al., col. 1, lines 15-17. As indicated above, Krueger et al. are silent as to a supporting device having “a slidably

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supported structure, wherein the slidably supported structure is in exclusively slidable engagement with the supporting device . . . .” As indicated by the Examiner in the January 20, 2006 Office Action, Krueger et al. disclose a single structure (i.e., mounting bracket 181) rigidly connected to compliance mechanism (10), rather than two separate structures -- a support device and a slidably supported structure -- exclusively slidably engaged with each other. Moreover, Krueger et al. expressly teach away from an application tip that maintains a particular course along an automobile body or workpiece by contacting either of two side walls. Quite differently, the application tip in Krueger et al. maintains its course along the workpiece by employing fluid-operated cylinders to provide constant regulated pressure contact with the workpiece in the direction of the biasing force of the cylinder.

Clitheros et al. disclose an adhesive application apparatus for applying a continuous adhesive material to the periphery of a window opening in a motor vehicle or a pane of glass sized to cover such window opening. See Clitheros et al., col. 1, lines 7-10. The invention of Clitheros et al. is specifically directed to preventing the application of the adhesive material in excess to save expense and prevent damage to the motor vehicle body as a result of inadequate removal of excess adhesive material. See Clitheros et al., col. 2, lines 1-6. Clitheros et al. disclose a dispenser means having a nozzle (16) and being movable via to a rigid framework of threaded (32) and unthreaded (30) guide rails rotated by drive motors (44, 74). See Clitheros et al., col. 2, lines 12-19. Clitheros et al. are silent, however, as to an apparatus whereby movement of a slidably support structure relative to a supporting device is due exclusively to a sliding engagement and solely in response to the tip of the processing head

contacting the side walls of the concave portion of the automobile body or workpiece when the slidably supported structure is moved relative to the automobile body or workpiece.

In sharp contrast, Clitheros et al. impart motion to the nozzle (16) using a rigid framework of threaded (32) and unthreaded (30) guide rails, whereby the physical engagement between guide rails and support block (28) is not exclusively slidable. Rather, support block (28) is threadably engaged with screw-threaded guide rail (32), such that nozzle (16) will move in a widthwise direction only if guide rail (32) is rotatably driven. Movement of support block (28) is contingent upon rotation of guide rail (32).

Furthermore, movement of the nozzle (16) in Clitheros et al. is determined, in advance, by a computer program, rather than being the result of continuous, instantaneous responses to contact made by nozzle (16). Clitheros et al. teaches away from moving the processing head solely in response to contact between the nozzle and the side walls of the path to be followed by, instead, employing threaded guide rails that prohibit natural freedom of movement and prevent support block (28) from making unprogrammed adjustments in reaction to the contour of an application path.

For at least the above reasons, Applicants respectfully submit that Krueger et al. and Clitheros et al. do not teach or suggest every element recited in independent claim 1 and that independent claim 1 is patentably distinct from both Krueger et al. and Clitheros et al., taken either alone or in combination. Further, Applicants submit that independent claim 25 is patentably distinct from both Krueger et al. and Clitheros et al., taken either alone or in combination for at least similar reasons. Also, Applicants submit that claims 6-10, 12-13, 44 and 47-56, which directly or indirectly depend from independent claims 1 or 25, are patentably

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distinct from Krueger et al. and Clitheros et al. for at least similar reasons. Accordingly, Applicants respectfully request withdrawal of this ground of rejection.

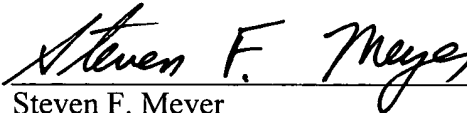
**CONCLUSION**

Based on the foregoing remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

Respectfully submitted,  
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